



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

November 12, 2008

Mr. Mark Paris
Basic Remediation Company (BRC)
875 West Warm Springs
Henderson, NV 89011

Re.: Nevada Division of Environmental Protection Response to:
Sampling and Analysis Plan for the Galleria North Sub-Area
dated October 2008 (received November 3, 2008)
NDEP Facility ID# H-000688

Dear Mr. Paris:

The NDEP has received and reviewed BRC's document identified above and finds that the document is acceptable. The following comments are provided for BRC's consideration in the development of future sampling and analysis plans (SAPs):

1. Page 1-1; Footnote 1, please change the 2nd instance of "acreage" to "acres" in the first sentence.
2. Page 1-1; last paragraph, 1st sentence, it is not clear what is meant here. It says that post-remediation investigation results are representative, but risk assessment will be based on the new data. Some clarification is needed to explain the post-remediation results are the new data.
3. Page 2-1; Section 2.1, 1st sentence, please change "character" to "characteristics"
4. Page 2-3; Footnote 4, some clarification is needed. It needs to be clarified that imported soil generally refers to soil from other BMI sub-areas but is from within the BMI Common Areas. In this case, the chemical data has already been considered. If the fill is "clean fill" coming from off-Site there is no need to consider chemical data.
5. Page 2-8; 2nd bullet, this bullet refers to waste characterization. The SAP suggests no IRMs have been performed, so it is not clear what waste was characterized. Please clarify that this was a characterization of the materials remaining in the ponds.
6. Page 3-5; paragraph after item 2, the list in this paragraph is numbered 1, 2, 3, 4B. It is not clear why the last item is numbered 4B as opposed to 4. "4B" is also used at the bottom of page 3-10.
7. Page 3-6; 6th bullet, it would be helpful to make clear earlier that fill materials are not expected to be imported to the Site.
8. Page 4-5; 3rd line, the word "additional" should be deleted from the end of this line, since no soil removal is planned initially.
9. Page 4-8; 3rd bullet, please note that the back-quantitation might not be needed. If the radionuclides are similar to background, then back-quantitation will be unnecessary. Even if

this is not the case, the main radionuclides might carry sufficient information to perform a risk assessment. This should be considered here.

10. Table 1, summary statistics should be recalculated based on an agreed upon format from prior discussions with BRC. This entails separating the detect summary statistics from non-detect summary statistics. In the current form of the table, there are some instances where the mean value falls below the minimum detect value (e.g., bromide). This should be reconciled. NDEP has prepared an example summary statistics table based on the recent CAMU data to demonstrate the information that NDEP would like to see in these tables. This example will be provided to the Companies in the near future. The main issue is to not allow the summary statistics to mask detection limit issues.
 - a. Appendix A, response-to-comments (RTC), RTC 9.c., the NDEP disagrees with BRC's response. As written the SAP considers the existing data on a point-by-point and chemical-by-chemical basis. This is not helpful for developing an understanding of the site or for conceptual site model development. NDEP requests that BRC include some additional data interpretation in future SAPs.

Should you have any questions or concerns, please do not hesitate to contact me at (702) 486-2850 x247 or brakvica@ndep.nv.gov.

Sincerely,

Brian A. Rakvica, P.E.
Supervisor, Special Projects Branch
Bureau of Corrective Actions

BAR:s

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